



**CTIA**

*Building The Wireless Future™*  
**Cellular Telecommunications Industry Association**

EX PARTE OR LATE FILED

July 18, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
12th Street Lobby, TW-A325  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

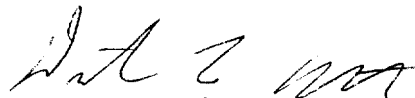
**Re: Ex Parte Presentation**  
**CC Docket No. 92-105**

Dear Ms. Salas:

On July 14, 2000, the Cellular Telecommunications Industry Association ("CTIA") represented by Andrea Williams, Assistant General Counsel, submitted the attached electronic mail transmission to Karen Peltz Strauss. The electronic mail submission discussed CMRS industry implementation of 711 for TRS. Specifically, the technical and operational challenges the CMRS industry is encountering.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter is being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

  
Dustun L. Ashton

Attachment(s)

No. of Copies rec'd 0+1  
List A B C D E



## **Andrea Williams**

**From:** Andrea Williams  
**Sent:** Friday, July 14, 2000 3:18 PM  
**To:** 'Karen Peltz Strauss'  
**Cc:** Brian Fontes  
**Subject:** 7-1-1 Implementation

**Importance:** High

Dear Karen:

I believe the Commission and CTIA are on the "same page" with respect to the use of 7-1-1 as the abbreviated dialing code for TRS. It appears that we differ on whether the Commission should address the implementation of 7-1-1/TRS service in this proceeding or another proceeding, *i.e.*, TRS companion proceeding. I hope my comments below clarify the industry's position on the 7-1-1 implementation issue.

It appears that the Commission views the reclamation and translation of the 7-1-1 code as a separate process than technical implementation of 7-1-1/TRS. Based on its experience in trying to implement E9-1-1, the wireless industry strongly believes that reclamation, translation and technical issues are intertwined with respect to the delivery of 7-1-1/TRS service to wireless customers. Whether its in this proceeding or the companion TRS proceeding, the FCC must be willing to deal with the implementation and coordination issues that will surely arise between carriers, TRS Centers and state PUCs. If not, the Commission is going to find itself in the same embarrassing dilemma as with wireless E9-1-1 implementation. Neither the Commission nor the wireless industry want to "travel that road again," particularly if we can avoid such technical and operational implementation issues from the outset.

While CMRS carriers should be able to reclaim and translate 7-1-1 into a seven or ten digit number within 12 months, CTIA and its members are concerned that wireless TRS users will equate reclamation and translation of 7-1-1 as ensuring the delivery of 7-1-1/TRS service to wireless customers. Reclamation and translation essentially drops the wireless TRS user at the doorsteps of the TRS Center. If the TRS Center cannot recognize the incoming wireless call as a bona fide TRS call within its jurisdiction, there are no guarantees that the wireless TRS user will be able to complete the call or take advantage of its wireless rate plan. (CTIA understands that the latter is a billing issue which the industry is attempting to address.)

Unless the TRS Center is capable of receiving the information from the wireless service provider (*i.e.*, recognizing that the call is a wireless TRS call, the wireless service provider, and routing the call appropriately), 7-1-1/TRS service will be meaningless to a wireless TRS user. Thus, the capabilities and readiness of the TRS Center is a critical component to whether wireless carriers will be able to fulfill its customer's expectations that when they dial 7-1-1 from their physical location, whether that location is inside or outside the carrier's service area, they will receive relay service.

If the FCC expects wireless carriers to reclaim, translate and implement 7-1-1/TRS service within 12 months, the Commission can anticipate delays from the outset. If the Commission feels that it must set a specific 12-month deadline, CTIA suggests that the Commission impose a deadline only for reclamation and translation of the 7-1-1 code by CMRS carriers within the proposed period of time. However, the Commission can use this Order to lay the groundwork for implementation of 7-1-1/TRS service, particularly for wireless TRS users by providing the following:

- Allow CMRS carriers a flexible approach in implementing 7-1-1/TRS
- Require TRS Centers to be capable of receiving the requisite information from the wireless carrier in a format determined by the carrier. If achieving such capability requires significant upgrades in the TRS Center, the TRS Center should be allowed to recover such costs from the TRS Fund.
- Cost recovery for CMRS carriers
- A statement from the Commission that it is willing to entertain requests for waiver of the rule under certain circumstances, *i.e.*, TRS Center is not prepared, insufficient cost recovery, technical and operational